

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ALIANZA AMERICAS, YANET DOE, PABLO
DOE, and JESUS DOE, on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

RONALD D. DESANTIS, Governor of Florida, in
his personal capacity; LAWRENCE A. KEEFE,
Florida Public Safety Czar, in his personal capacity;
JAMES UTHMEIER, Chief of Staff to Florida
Governor, in his personal capacity; JAMES
MONTGOMERIE; PERLA HUERTA; and
VERTOL SYSTEMS COMPANY, INC.,

Defendants.

Civil Action No.
22-11550-ADB

**MOTION FOR CORRECTION TO PLAINTIFFS CONSOLIDATED OPPOSITION TO
DEFENDANTS' MOTIONS TO DISMISS THE SECOND AMENDED COMPLAINT**

Plaintiffs Alianza Americas and Yanet Doe, Pablo Doe, and Jesus Doe, on behalf of themselves and all others similarly situated (together, "Plaintiffs"), respectfully move for a limited correction to two citations contained in their consolidated opposition to Defendants' motions to dismiss, ECF 161 ("Opposition").

Plaintiffs Opposition contains two typographical errors. First, the Opposition states "[Montgomerie] signed the memorandum responding to FDOT's request for quote. Leonetti Decl., Ex. 19." Opposition at 33. The correct citation is Leonetti Decl., Ex. 21 (ECF 129-19), which is also part of the record attached to the same declaration. Second, the Opposition also states, "And [Montgomerie] personally signed and submitted the final bid which contemplated 'relocation of individuals to the State of Massachusetts.' Leonetti Decl., Ex. 27 at 6." Opposition at 33-34. The

correct citation is Leonetti Decl. Ex. 29 at 6 (ECF 129-27), which is also part of the record attached to the same declaration.

In both instances, Plaintiffs inadvertently used the ECF number instead of the actual exhibit number when citing to the relevant documents. For example, Exhibit 29 is ECF 129-27; Plaintiffs cited Exhibit 29 as Exhibit 27 based on this ECF numbering.

If the Court grants this motion, Plaintiffs propose that they file a corrected Opposition.

Defendant Huerta and State Defendants assent to this motion. Defendant Montgomerie also assents to this motion (and Plaintiffs assent to Defendant Montgomerie filing a surreply to address these corrected citations).

WHEREFORE, Plaintiffs respectfully request that the Court grant this Motion, permit them to file a corrected Opposition, and grant such other and further relief as is just and proper.

Dated: December 11, 2024

Respectfully submitted,

/s/ Kenneth S. Leonetti

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CERTIFICATE OF CONFERENCE

In accordance with Local Rule 7.1(a), I hereby certify that counsel for Plaintiffs conferred with counsel for Defendants via email and attempted in good faith to resolve or narrow the issues set forth in this motion, and all parties assent to the relief requested.

/s/ Rachel L. Kerner

Rachel L. Kerner

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the Court's ECF System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on December 11, 2024.

/s/ Kenneth S. Leonetti

Kenneth S. Leonetti